

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

<b>AMERICAN FEDERATION OF MUSICIANS,</b>	)	
	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Case No. 3:15-mc-00122-M-BN</b>
	)	
<b>SKODAM Films, LLC,</b>	)	<b>Principal case pending in the</b>
	)	<b>United States District Court for the</b>
	)	<b>Central District of California</b>
	)	<b>Case No. 2:15-cv-04302-DMG-PJW</b>
	)	
<b>Defendant/Non-Party.</b>	)	

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**MOTION TO APPEAR AT HEARING TELEPHONICALLY**

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SKODAM Films, LLC (“SKODAM”), by and through counsel, files its Motion to Appear at Hearing Telephonically. In support of its Motion, SKODAM states the following:

1. Plaintiff American Federation of Musicians (“AFM”) has sued Paramount Pictures Corporation in California.
2. The lawsuit involves the movie *Same Kind of Different as Me* (“the Movie”).
3. SKODAM, who is not a party to the lawsuit, produced the Movie.
4. AFM served SKODAM with a third-party subpoena *duces tecum* (“Subpoena”) issued in the California case.
5. On November 6, 2015, AFM filed an Expedited Motion to Compel SKODAM Films, LLC to Comply with Properly Served Subpoena (“Motion to Compel”) in this Court [Dkt. 1].
6. At the request of AFM, this Court scheduled oral argument on AFM’s Motion to

Compel for December 3, 2015 in Dallas, Texas [Dkt. 5].

7. Brunini, Grantham, Grower, & Hewes, PLLC (“Brunini”) is lead counsel for SKODAM and is located in Jackson, Mississippi.

8. SKODAM has already incurred significant expense in responding to AFM’s Subpoena and Motion to Compel, and will continue to incur significant expense until this matter has concluded.

9. Thus, to minimize the costs associated with AFM’s Subpoena, SKODAM respectfully requests this Court to allow the attorneys of Brunini to appear telephonically for the December 3<sup>rd</sup> oral argument on AFM’s Motion to Compel.

10. Counsel for SKODAM has conferred with counsel for AFM, and AFM does not object to SKODAM’s request.

ACCORDINGLY, SKODAM Films, LLC respectfully requests this Court to allow its lead counsel to appear telephonically for the oral argument scheduled for December 3, 2015 in Dallas, Texas in this matter. SKODAM Films, LLC respectfully requests such other relief as this Court deems appropriate.

Dated: November 23, 2015.

Respectfully Submitted,

SKODAM Films, LLC

/s/ Michael Merrick

One of its Attorneys

OF COUNSEL:

Michael Merrick  
Texas Bar No. 24041474  
CANTEY HANGER LLP  
1999 Bryan Street, Suite 3300  
Dallas, Texas 75201  
Telephone: (214) 978-4100  
Facsimile: (214) 978-4150  
[mmerrick@canteyhanger.com](mailto:mmerrick@canteyhanger.com)

Stephen J. Carmody (*pro hac vice application to be filed*)  
Karen E. Howell (*pro hac vice application to be filed*)  
Lauren O. Lawhorn (*pro hac vice application to be filed*)  
BRUNINI, GRANTHAM, GROWER & HEWES, PLLC  
Post Office Drawer 119  
Jackson, Mississippi 39205  
Telephone: (601) 948-3101  
Facsimile: (601) 960-6902  
[scarmody@brunini.com](mailto:scarmody@brunini.com)  
[khowell@brunini.com](mailto:khowell@brunini.com)  
[llawhorn@brunini.com](mailto:llawhorn@brunini.com)

**CERTIFICATE OF CONFERENCE**

In compliance with Local Rule 7.1(b), I hereby certify that Counsel for SKODAM has conferred with counsel for AFM, and AFM does not object to SKODAM's request to appear telephonically at the December 3<sup>rd</sup> hearing. Thus, this motion is unopposed.

This the 23rd day of November, 2015.

/s/ Michael Merrick  
Michael Merrick

**CERTIFICATE OF SERVICE**

I hereby certify that on this date I electronically filed the foregoing with the Clerk of the Court by using the CM-ECF system which sent a copy to all counsel of record.

This the 23rd day of November, 2015.

/s/ Michael Merrick

Michael Merrick